12.0 RECOMMENDED REMOVAL ACTION ALTERNATIVE

The No Action alternative will not provide protection of human health and the environment and compliance with ARARs. This alternative will not provide long-term effectiveness and performance of protective measures. It will not reduce the toxicity, mobility or volume through treatment. The application of the Interim Measure as part of this alternative will provide short-term effectiveness for solution containment efforts, but will not provide for the evaporation of the necessary volume of meteoric water in the long-term.

The Closure of the Heap Leach Pads in Place alternative provides protection to human health and the environment. However, the ability of this alternative to meet the selection criteria depends on maintaining the integrity of the reduced infiltration caps. Cyanide levels in the heap leach material have not been reduced by rinsing and would remain above discharge limits. The remote location of the mine site and the potential for damage to the caps occur through vandalism or natural means reduces the long-term effectiveness of this alternative.

The Clean Closure of the Heap Leach Pads in Place alternative provides for significant protection of human health and the environment, long-term effectiveness, reduction in mobility, short-term effectiveness, and implementability. Incorporation of the pit backfill option with this alternative would further reduce any safety issues associated with the pit and utilization of the pit as a water source by local wildlife.

The Off Site Closure, removal to a landfill, alternative provides protection to human health and the environment, long-term effectiveness, reduction in mobility, and short-term effectiveness. Removing the potentially hazardous and contaminated materials from the site attains the protection provided by this alternative. However, the cost to implement this alternative is prohibitive, particularly when similar assurances in risk reduction can be achieved through alternatives costing orders of magnitude less to implement.

The 4EM Proposal alternative, transforming heap leach pad materials into a beneficial additive for concrete, provides protection to human health and the environment, long-term effectiveness, reduction in mobility, and short-term effectiveness. Removing the potentially hazardous and contaminated materials from the site and reclamation of the footprint of the two pads and PSP

attains the protection provided by this alternative. If selected as the preferred alternative engineering details as well as specific measures to protect human health and the environment as well as MNP requirements would be developed in response to permit necessities and environmental analysis.